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11 Attorneys for Defendants
12 K.O.O. Construction, Inc. and Keith Odister

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

15 TRAVELERS CASUALTY AND
16 SURETY COMPANY OF
17 AMERICA, a Connecticut
corporation,

18 Plaintiff,

19 v.

20 K.O.O. CONSTRUCTION, INC., a
21 California corporation; and KEITH
ODISTER, an individual, inclusive,

22 Defendants.
23

Case No. 316-CV-00518-JCS

**STIPULATION AND REQUEST TO
EXTEND TIME TO FILE
STIPULATION OR
ADMINISTRATIVE MOTION FOR
ENTRY OF JUDGMENT**

(Civil Local Rule 7-11)

24 On November 5, 2018, this Court entered an order on the parties' stipulation
25 that a stipulation or an administrative motion for entry of judgment would be filed
26 by November 8, 2018. (Dkt. No. 225.) The undersigned counsel have been
27 working on a stipulation in lieu of such an administrative motion as required by
28



1 Civil Local Rule 7-11(a), but disagreements remain on its contents, particularly
2 with regard to prejudgment interest. While significant progress has been made in
3 closing the gap between the parties' respective positions, the parties did not reach
4 an agreement as to the language of stipulation to enter judgment as of the date of
5 the filing of this document.

6 The parties have made sincere good-faith efforts to agree upon the terms of a
7 stipulated judgment. Undersigned counsel believe that further negotiations in the
8 next week may allow the parties to come to an agreement on the total amount and
9 terms of a stipulated judgment, thus sparing the Court the burden of considering a
10 motion on entry of judgment. The parties therefore respectfully request that this
11 Court give them another week to try to agree to the terms of a stipulated judgment,
12 with the parties' stipulation or an administrative motion being filed on or before
13 November 15, 2018.

14
15 Dated: November 8, 2018

SMTD LAW LLP

17 By: /s/ Edward R. Stepan

18 Michael Timpane
19 Edward R. Stepan
20 Attorneys for Plaintiff
21 TRAVELERS CASUALTY AND
22 SURETY COMPANY OF
23 AMERICA

24
25 Dated: November 8, 2018

**REYNOLDS MADDUX
WOODWARD LLP**

26 By: /s/ Arthur G. Woodward

27 Arthur G. Woodward
28 Attorneys for
Defendants/Counterclaimants
K.O.O. CONSTRUCTION, INC.
AND KEITH ODISTER